

1 RENE L. VALLADARES  
2 Federal Public Defender  
3 District of Nevada  
4 State Bar No. 11479  
5 William Carrico  
6 Assistant Federal Public Defender  
7 State Bar No. 003042  
8 411 E. Bonneville, Ste. 250  
9 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
(702) 388-6261/Fax

10 Attorney for Thomas A. Cecrle

11

12 UNITED STATES DISTRICT COURT  
13 DISTRICT OF NEVADA

14

\*\*\*

15 UNITED STATES OF AMERICA,

2:12-cr-400-JAD-GWF

16 Plaintiff,

17 vs.

18 THOMAS A. CECRLE,

19 **STIPULATION TO CONTINUE**  
**SELF SURRENDER DATE**  
(First Request)

20 Defendant.

**ORDER**

21 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United  
22 States Attorney, and Steven W. Myhre, Assistant United States Attorney, counsel for the United  
23 States of America, and Rene L. Valladares, Federal Public Defender, and William Carrico, Assistant  
24 Federal Public Defender, counsel for THOMAS A. CECRLE, that the self surrender date for  
25 Tuesday, June 2, 2015, be vacated and continued to July 14, 2015.

26 This Stipulation is entered into for the following reasons:

27 1. Since the time of sentencing, Tom Cecrle has been trying to place his mother in an  
assisted living environment suitable for Alzheimer's patients.

28 2. Her income is insufficient to pay the costs, so he has been applying and attempting  
to qualify her for assistance. Just recently, the State of Nevada informed him that they would not

/ / /

1       be able to place her until August 2015, however though intensified efforts by Tom, he is now  
2 informed that the date has moved up to early July.

3           3.       Tom Cecrle's surrender date is currently June 2, 2015. He has been designated to  
4 Florence, Colorado where he is to self-surrender by 12:00 Noon. He had all arrangements made to  
5 comply with that directive.

6           4.       As late as May 26, 2015, the Nevada Alzheimer's Association told Mr. Cecrle that  
7 they had to return some of his mother's paperwork due to some missing information on two pages.  
8 Nonetheless, Mr. Cecrle remains confident that if the Court will permit him to self-surrender on July  
9 14, 2015 by 12:00 noon, he will be able to meet his obligations to his mother, ensure her care as  
10 much as possible, and also meet his obligations to this Court.

11           5.       The defendant is not incarcerated and does not object to the continuance.

12           6.       The parties agree to the continuance.

13           7.       This is the first request for a continuance of the self surrender date filed herein.

14           DATED this 27<sup>th</sup> day of May, 2015.

15           RENE L. VALLADARES  
16           Federal Public Defender

DANIEL G. BOGDEN  
United States Attorney

17           */s/ William Carrico*

*/s/ Steven W. Myhre*

By: \_\_\_\_\_  
18           WILLIAM CARRICO,  
Assistant Federal Public Defender

By: \_\_\_\_\_  
STEVEN W. MYHRE,  
Assistant United States Attorney

19

20

21

22

23

24

25

26

27

28

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3  
4 UNITED STATES OF AMERICA,  
5 Plaintiff,  
6 vs.  
7 THOMAS A. CECRLE,  
8 Defendant.

9  
10  
11 2:12-cr-400-JAD-GWF

12 **ORDER**

13 Based on the pending Stipulation of counsel, and good cause appearing,  
14 IT IS THEREFORE ORDERED that the self surrender date currently scheduled for Tuesday,  
15 June 2, 2015, be vacated and continued to 7/14/15 at the hour of 12:00 p.m.  
16 DATED this 28th day of May, 2015.

17  
18   
19 UNITED STATES DISTRICT JUDGE  
20  
21  
22  
23  
24  
25  
26  
27  
28